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ADMITTED IN NEW YORK,
CONNECTICUT, NEW JERSEY,
& MASSACHUSETTSUSDS SDNY
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March 4, 2008

BY TELEFAX

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Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 2260
New York, NY 10007Re: Giorgos B Maritime Ltd. v. Reynolds Shipping (USA) LLC
07 Civ. 10387 (KPC)
Our file: 2600026

Dear Judge Castel:

We are attorneys for plaintiff in this Rule B maritime attachment action and request a second adjournment of the pretrial conference which had originally been adjourned from Friday, January 4, 2008, at 11:00 a.m., until Friday, March 7, 2008, at 9:15 a.m., pursuant to Your Order dated December 27, 2007.

By way of background, plaintiff is a Greek corporation and was the owner of the M/T GIORGOS B (the "Vessel"). In July of 2005, the defendant, a Texas-based corporation, chartered the Vessel from plaintiff and subsequently failed to pay charter hire that was due and owing, failed to pay for other expenses incurred by plaintiff, and re-delivered the Vessel early causing plaintiff to incur lost profits.

Plaintiff commenced London arbitration to recover damages totaling \$1,256,432.00, inclusive of interest and costs (recoverable in London arbitration), and brought this action to obtain pre-judgment security.

Plaintiff has been serving garnishee banks with the process of maritime attachment and garnishment since November 19, 2007, but has not yet obtained any security for its claims.

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Since defendant's property has not been attached, plaintiff has not notified defendant of this action under Rule B(2). Thus, to date, defendant has not appeared in this action.

In light of the fact that plaintiff continues to seek security from defendant, we respectfully suggest that there is no need for an initial pretrial conference at this time.

Unless and until defendant has appeared in the action, no discovery is necessary, particularly since the parties have agreed by the terms of their charter party to arbitrate the underlying claims in London, England.

Accordingly, we request the pretrial conference presently scheduled for March 7 at 9:15 a.m. be adjourned for another sixty (60) to ninety (90) days.

We thank you for your attention to this matter.

Respectfully yours,

Lyons & Flood, LLP

By: Kirk M. Lyons
Kirk M. Lyons

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*I will adjourn the conference
from March 7 to May 9, 2008 at 10:15 a.m.
If no attachment has transpired
by then, the action will be
dismissed without prejudice.
SO ORDERED
J. M. [Signature] JSPS
3-4-08*